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Attorneys Specially Appearing For Defendant,  
Carolynne Tilga

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

DANIEL L. BALSAM, an individual,

Plaintiff,

vs.

ANGELES TECHNOLOGY, INC., a  
Nevada corporation; FUTURECAST  
MEDIA LLC, a New Mexico limited  
liability corporation; ONE WORLD  
MEDIA LLC, a New Mexico limited  
liability corporation; CAROLYNNE  
TILGA, an individual; GRANT  
SIMMONS, an individual; JOHN  
SOLAMITO, an individual; *et al.* and  
DOES 1 to 100,

Defendants.

Case No. C06 04114 JF

STIPULATION TO CONTINUE PRE-  
TRIAL DATES; [PROPOSED] ORDER  
THEREON

1 Defendant Carolynne Tilga, specially appearing through her counsel, The  
2 Kaufman Law Group, Gary Jay Kaufman, Esq. and Plaintiff Daniel Balsam, through  
3 his counsel Walton & Roess, LLP, Timothy Walton, Esq., hereby stipulate as  
4 follows:

5 The parties agree that this stipulation does not constitute a general appearance  
6 by Defendant Tilga, and it is not a consent to the exercise of the Court's jurisdiction  
7 over her, but rather is entered merely to preserve judicial economy;

8 WHEREAS, Plaintiff recently filed a first amended complaint naming  
9 numerous additional defendants, who have not been served;

10 WHEREAS, Defendant Tilga has scheduled a hearing on her motion to  
11 dismiss the first amended complaint for, *inter alia*, lack of personal jurisdiction on  
12 December 1, 2006. The parties, through their counsel, agree that Tilga's response to  
13 the complaint (moving papers) must be filed and served on or before October 27,  
14 2006.

15 Additionally, the parties request that the Court continue the case management  
16 conference to be heard at least 28 days after the hearing on Defendant Tilga's  
17 motion to dismiss for lack of jurisdiction, as Defendant Tilga does not believe that  
18 the Court has jurisdiction of this matter and objects to participating in the lawsuit  
19 before the Court rules on the jurisdictional issue.

20 Accordingly, the parties request that the Court schedule the case management  
21 conference on or after December 28, 2006.

22 Separately, Defendant Tilga's counsel requests that the Court allow them to  
23 appear by telephone at the hearing on Defendant Tilga's motion to dismiss on  
24 December 1, and to appear by telephone at the case management conference if the  
25 first amended complaint is not dismissed. Plaintiff does not object to Defendant  
26 Tilga's counsel appearance by telephone.

27 ///

28 ///

1 Dated: September 29, 2006

THE KAUFMAN LAW GROUP

2  
3 By: 

4 Gary Jay Kaufman

5 Attorneys Specially Appearing for Defendant,  
Carolynne Tilga

6 Dated: October 2, 2006

WALTON & ROESS, LLP

7  
8 By: 

9 Timothy Walton

10 Attorneys for Plaintiff, Daniel Balsam

11 ORDER

12 IT IS HEREBY ORDERED THAT Defendant Carolynne Tilga's response to  
13 the first amended complaint must be filed and served on or before October 27, 2006.

14 IT IS FURTHER ORDERED THAT the case management conference  
15 ("CMC") is continued to 1/12/07 at 10:30 AM.

16 IT IS FURTHER ORDERED THAT at least 21 days before the CMC, the  
17 parties shall meet and confer re: initial disclosures, early settlement, ADR process  
18 selection, and discovery plan; file ADR Certification signed by Parties and Counsel;  
19 and file either Stipulation to ADR Process or Notice Of Need For ADR Phone  
20 Conference;

21 IT IS FURTHER ORDERED THAT at least 7 days before the CMC is the  
22 last day for the parties to complete initial disclosures or state objection in Rule 26(f)  
23 Report, file Case Management Statement and file Rule 26(f) Report.

24 DATED: 10/3/06

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26  
27   
28 Hon. Jeremy Fogel